UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS CENTRAL DIVISION

RABAB JABER,)	
Plaintiff)	
)	
v.)	Civil Action No.: 4:10-CV-10293-FDS
)	
)	
WAL-MART STORES, INC.)	
Defendant)	

JOINT MOTION TO EXTEND SCHEDULING ORDER DEADLINES

NOW COME the Parties, Rabab Jaber and Wal-Mart Stores, Inc., and jointly respectfully request that this Honorable Court extend the scheduling order deadlines as follows:

- 1. Extend the non-expert deposition deadline to **December 21, 2010**;
- 2. Extend the Plaintiff's expert disclosure deadline to January 14, 2011;
- 3. Extend the Defendant's expert disclosure deadline to February 14, 2011;
- 4. Extend the expert depositions deadline to March 11, 2011;
- 5. Extend the Defendant's Summary Judgment Motion deadline to **March 31**, **2011**:
- 6. Extend the Plaintiff's Opposition to Defendant's Summary Judgment motion deadline to **April 8, 2011.**

As grounds therefor, the Plaintiff submits the attached Memorandum of Law herewith.

WHEREFORE, the Plaintiff requests that this Honorable Court allow the Parties' Joint Motion to Extend the Scheduling Order Deadlines as specifically noted above.

The Plaintiff, RABAB JABER, By her Attorney,

/S/_Robert A. Riordan, Jr. Robert A. Riordan, Jr. BBO #630171 ELLIS LAW OFFICES, LLP 33 Pleasant Street, Suite 2 Worcester, MA 01609 Tel: (508) 757-7451

Fax: (508) 757-4298

The Defendant, WAL-MART STORES, INC. By its Attorney,

/S/_Sarah B. Affel_
Richard E. Quinby (BBO# 545641)
Sarah B. Affel (BBO# 672651)
Craig and Macauley, PC
Federal Reserve Plaza
600 Atlantic Avenue
Boston, MA 02110
(617) 367-9500
Fax: (617) 742-1788

CERTIFICATE OF SERVICE

I, Robert A. Riordan, Jr., under oath, certify that I electronically filed the foregoing document pursuant to Local Rule 7.1 using the CM/ECF system, and this day served a copy of the foregoing document to the Defendant, Wal-Mart Stores, Inc., by e-mailing and mailing same first class, postage prepaid, to their attorneys of record:

Richard E. Quinby (BBO# 545641) Sarah B. Affel (BBO# 672651) Craig and Macauley, PC Federal Reserve Plaza 600 Atlantic Avenue Boston, MA 02110 (617) 367-9500 Fax: (617) 742-1788

> /S/ Robert A. Riordan, Jr. Robert A. Riordan, Jr., Esq. BBO#: 630171 Ellis Law Offices, LLP 33 Pleasant Street, Suite 2 Worcester, MA 01609 (508) 757-7451 Fax: (508) 757-4298

DATED: November 9, 2010